

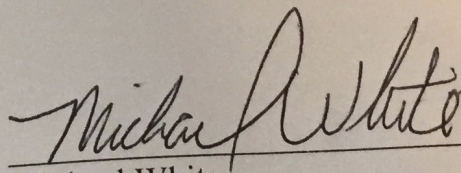
## DECLARATION OF MICHAEL WHITE

Michael White, declare as follows:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the matters set forth in this Declaration and could, and would, testify competently thereto under penalty of perjury.
2. I was employed by WestRock Services Inc. ("WestRock"), or its predecessor, for over twenty six years until my separation on January 31, 2018.
3. My last position with WestRock was as Production Supervisor and Safety Coordinator.
4. I supervised the production employees in the fulfillment center in Gallatin, Tennessee.
5. The fulfillment center employees were made up of both male and female employees.
6. In my estimation, the employees were 40% - 50% female, and on some days it could be more depending on temporary employees.
7. Women worked in the following job classifications: shipping department, production leads, quality technicians, customer service representative, among others.
8. There are many women working around the fulfillment center production floor and shipping department on any given day.

In accordance with 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

This the 23 day of February 2018.

  
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Michael White